

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**DAVID WHITT,**

**Plaintiff,**

**v.**

**CITY OF ST. LOUIS, et al.,**

**Defendants.**

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**Case No. 4:18-CV-01294**

**CONSENT MOTION FOR A PROTECTIVE ORDER**

Defendants City of St. Louis, Detective Bobby D. Baine, Sergeant Matthew T. Karnowski, Officer Ryan J. Linhorst, and Officer Matthew A. Shaw, through counsel, hereby moves this Court to enter a protective order protecting documents, other tangible items, and/or testimony relating to confidential and/or proprietary information produced in connection with this matter. In support of their motion, Defendants state as follows:

1. Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii), Defendants identified certain documents which they may use to support their claims and defenses. These documents may include police reports with arrestee information, security-sensitive policies, and medical records.
2. Defendants anticipate that additional sensitive and confidential material will be identified and produced in this case.
3. Understanding the reasons for the confidential treatment of certain materials, the Defendants believe that a protective order will continue to facilitate discovery in this matter while protecting confidential materials from being made public. A copy of the stipulated proposed protective order is attached as Exhibit A.

4. The protective order will not hinder discovery. Rather it will facilitate the parties' ability to proceed with their respective discovery obligations.
5. Counsel for the Plaintiff has been contacted, reviewed the proposed stipulated order attached as Exhibit A, and consents to the entry of the protective order.

Respectfully Submitted,

JULIAN BUSH  
CITY COUNSELOR

By: /s/ Abby Duncan  
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**CERTIFICATE OF SERVICE**

I hereby certify the foregoing was electronically filed on February 13, 2020 with the Court for service by means of Notice of Electronic Filing upon all attorneys of record.

/s/ Abby Duncan